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**NO FEE – GOV'T CODE § 6103**

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA

9 COUNTY OF LOS ANGELES, CENTRAL DISTRICT

10  
11 THE PEOPLE OF THE STATE OF CALIFORNIA,

} Case No.:

12 Plaintiff,

**COMPLAINT FOR ABATEMENT AND  
INJUNCTION**

13 vs.  
14 DORION ORLANDO MURRAY, as an individual  
15 and as trustee of THE ALBERT AND DELORES  
16 MURRAY FAMILY TRUST DATED JULY 18, 1996  
and THE REVOCABLE LIVING TRUST OF  
ALBERT J. MURRAY; and DOES 1 through 25,  
inclusive,

[Health and Safety Code section 11570,  
et seq.; Civil Code section 3479, et seq.]

(Unlimited Action)

17 Defendants.  
18  
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20  
21

22  
23 PLAINTIFF, THE PEOPLE OF THE STATE OF CALIFORNIA, alleges as follows:

24 I. **INTRODUCTION**

25 1. This action ("Action") is brought and prosecuted by Plaintiff, the People of the  
26 State of California ("People"), for the purpose of abating an ongoing public nuisance which  
27 exists at a duplex located at 1241-1243 Meadowbrook in the Miracle Mile area of Los  
28 Angeles ("Property") in the Los Angeles Police Department's ("LAPD") Wilshire Division.

1 The Action is brought pursuant to the Narcotics Abatement Law, California Health and  
2 Safety Code section 11570, et seq. ("NAL") and the Public Nuisance Law, Civil Code  
3 sections 3479-3480 ("PNL").

4 2. Plaintiff is filing this lawsuit in an effort to address unlawful nuisance activity,  
5 including narcotics sales, occurring at and related to the Property. Defendant DORIAN  
6 ORLANDO MURRAY ("Defendant MURRAY"), a 52-year-old male, is a resident and the  
7 person in control of the Property. Defendant MURRAY has an extensive criminal  
8 background, which includes felony narcotics, violence and firearm-related convictions.  
9 Now, a recent LAPD investigation reveals that Defendant MURRAY, on an ongoing basis,  
10 sells methamphetamine and cocaine base at the Property and uses the Property to store  
11 narcotics, creating a public nuisance that affects the entire surrounding area. More  
12 specifically, since at least December 5, 2017, Defendant MURRAY has been convicted at  
13 least twice for narcotics sales crimes at the Property. Most recently, on March 3, 2019,  
14 during a probation check of Defendant MURRAY at the Property, LAPD officers recovered  
15 numerous bindles of methamphetamine and cocaine base, individually packaged for sales  
16 and \$1880 in cash on Defendant MURRAY's person. Defendant MURRAY was  
17 subsequently convicted of possession of a controlled substance for sale (in violation of  
18 Health & Safety Code section 11351.5) and is currently on formal probation for both cases  
19 as a result.

20 3. Defendant MURRAY's parents, Albert John Murray and Delores Marie  
21 Murray, originally owned the Property. In 1996, they transferred title to the Property to The  
22 Albert and Delores Murray Family Trust dated July 18, 1996 ("1996 Trust"). On March 31,  
23 2010, Dolores Marie Murray died at the age of 83. Thereafter, from an unknown time, but  
24 at least from about July 29, 2010, Defendant MURRAY moved into the Property with his  
25 father, where he continues to reside even after his father's 2016 death, with various other  
26 unknown and/or unidentified individuals. Prior to his death in 2016, Albert John Murray  
27 transferred title to three real properties, including the Property, seemingly disposing of his  
28 assets. In 2016, Defendant MURRAY attempted to undermine his father's earlier wishes

1 for his benefit and sued to unwind the three real property transfers. As a result, ownership  
2 of the Property is currently part of a vigorous multi-case litigation battle among Albert's  
3 heirs, as explained in Section II.D., below.

4        4.        The narcotics activity and general nuisance at the Property has not only  
5 significantly affected the quality of life and the quiet enjoyment of property, but it has also  
6 taxed scarce police resources by necessitating a disproportionate amount of LAPD  
7 attention. The People bring this Action to obtain an injunction and other relief that will  
8 prevent the narcotics nuisance at the Property and require Defendant MURRAY and all  
9 others living or visiting the Property to take steps to bring the unacceptable state of affairs  
10 at the Property to a halt.

## II. THE PARTIES AND THE PROPERTY

**A. Plaintiff**

13       5. Plaintiff, the People, is the sovereign power of the State of California  
14 designated in Health and Safety Code section 11571, and Code of Civil Procedure section  
15 731 to be the complaining party in law enforcement actions brought to abate, enjoin and  
16 penalize narcotics nuisances and public nuisances, respectively.

**B. Defendant**

18       6.      Defendant MURRAY, a self admitted School Yard Crip gang member with the  
19 moniker of "Fat Cat", is a resident of the Property and is currently disputing the ownership  
20 of the Property, as further detailed below. Defendant MURRAY asserts that he is the  
21 successor trustee of 1996 Trust, and a subsequently created trust, The Revocable Living  
22 Trust of Albert J. Murray dated April 21, 2011 ("2011 Trust") (collectively "Trusts").<sup>1</sup>  
23 Defendant MURRAY has occupied, controlled and/or operated the Property, and/or has  
24 acted as the owner and occupier of the Property.

27       <sup>1</sup> Plaintiff sues Defendant MURRAY in his capacity as trustee of the Trusts out of an abundance of  
28 caution since this issue has not yet been adjudicated by the Court. However, Plaintiff's identification of Defendant MURRAY as trustee of the Trusts here should not be interpreted as supporting any of Defendant MURRAY's claims or contentions in other litigation.

1           7. Defendant MURRAY has an extensive criminal background with multiple  
2 felony and misdemeanor convictions. In March 2019, Defendant MURRAY was convicted  
3 of possession of a controlled substance for sale (in violation of Health & Safety Code  
4 section 11351.5) after LAPD officers conducted a probation search at the Property and  
5 recovered multiple bindles of methamphetamine and cocaine base individually wrapped for  
6 sales. In December 2017, Defendant MURRAY was convicted of narcotics sales (in  
7 violation of Health & Safety Code section 11379(a)) after he sold methamphetamine to an  
8 informant and officers recovered additional methamphetamine and \$1,195 in cash at the  
9 Property. In addition to these convictions, Defendant MURRAY's criminal history also  
10 includes several convictions for felonies and misdemeanors, including robbery, battery, and  
11 firearm related crimes.

12           8. The true names and capacities of Defendants sued herein as DOES 1  
13 through 25, inclusive, are unknown to Plaintiff, who therefore sues said Defendants by such  
14 fictitious names. When the true names and capacities of said Defendants have been  
15 ascertained, Plaintiff will ask leave of the Court to amend this Complaint and to insert in lieu  
16 of such fictitious names the true names and capacities of said fictitiously named  
17 Defendants.

18           C. **The Property**

19           9. The Property is located at the commonly-known address of 1241 and 1243  
20 Meadowbrook Avenue, Los Angeles, California 90019, in the Miracle Mile neighborhood of  
21 Los Angeles, California 90019. The Property's legal description is, "Lot 476 in Tract No.  
22 5069, as per Map recorded in book 56, pages 82-85 of Maps, in the Office of the County  
23 Recorder of said County. Commonly Known As: 1241 and 1243 Meadowbrook Avenue,  
24 Los Angeles, CA 90019." Assessor's Parcel Number: 5084-032-008.

25           10. The Property, which is situated in a residential neighborhood, consists of a  
26 two-story duplex situated on the west side of Meadowbrook Avenue, one structure north of  
27 San Vicente Boulevard. Defendant MURRAY resides in unit 1241. Plaintiff is informed and  
28 believes that Defendant MURRAY has custody and control of unit 1243 and allows his adult

1 son, Dorian N. Murray, or other family and friends to reside there.

2       **D.     Pending Litigation Regarding Property Ownership**

3       11.    The ownership interests of the Property and of two other properties in  
4 Compton, California are currently being litigated by Albert John Murray's heirs in three  
5 widely contested court proceedings, as explained below.

6       12.    On December 12, 2012, Albert John Murray, as trustee of the 1996 Trust,  
7 transferred title to the Property to his grandson, Rashaad Lamar Gilbert, his daughter's  
8 (Brenda Gilbert) son. Brenda is Defendant MURRAY's sole sibling. Thereafter, in March  
9 2013, Albert John Murray also transferred title of two other real properties in Compton; one  
10 to his daughter, Brenda, and the other, to two of Defendant MURRAY's children.

11       13.    In 2015, Defendant MURRAY alleging to be trustee of the Trusts, transferred  
12 title to the Property to himself, via a corporation he controls. Thereafter, on April 6, 2016,  
13 Rashaad Lamar Gilbert (the original Property owner's grandson and Defendant MURRAY's  
14 nephew) sued Defendant MURRAY and his corporation to quiet title of the Property (Los  
15 Angeles Superior Court ("LASC") Case No. BC616115).

16       14.    On May 16, 2016, Defendant MURRAY, asserting to be the successor trustee  
17 of the Trusts, filed a petition in probate court for the return of the Property and the two  
18 Compton properties previously transferred by Albert John Murray to the Trusts, pursuant to  
19 California Probate Code section 17200(a) (LASC Case No. 16STPB00401).<sup>2</sup>

20       15.    After Albert John Murray's death, at 94-years of age, Defendant MURRAY  
21 filed a petition for letters of administration and moved to probate the will of decedent Albert  
22 John Murray (LASC Case No. 17STPB04406).

23       16.    In these cases, Defendant MURRAY asserts, in part, that the 1996 Trust was  
24 amended making him the trustee and a beneficiary of the Trusts.<sup>3</sup> In addition, he contends  
25 that the three real properties, which were transferred by decedent Albert John Murray,

26

27       <sup>2</sup> Albert John Murray, who was 93-years old at the time, was also a named plaintiff in this litigation,  
but Defendant MURRAY appeared to be the person driving the litigation.

28       <sup>3</sup> Albert John Murray purportedly amended the Trusts several times.

1 actually belong to the Trusts and that their transfer should be rescinded because decedent  
2 Albert John Murray was tricked by relatives into transferring title of these properties.

3 17. Conversely, these relatives contend, in part, that subsequent amendment(s)  
4 to the Trusts were procured by fraud or undue influence by Defendant MURRAY.

5 18. The litigation in these three underlying cases is ongoing, with the ownership  
6 of the three real properties hanging in the balance and millions at stake. The Property  
7 alone is owned outright and valued at approximately one and a half million dollars.

### 8 III. NARCOTICS ABATEMENT LAW

9 19. The abatement of a nuisance is a long established and well-recognized  
10 exercise of the state's police power. (*People v. Barbiere* (1917) 33 Cal.App. 770, 775;  
11 *People ex rel. Hicks v. Sarong Gals* (1974) 42 Cal.App.3d 556, 563.) Since its enactment  
12 in 1972, the principal purpose of the NAL (Health & Saf. Code, § 11570, et seq.) is the  
13 abatement of buildings and places "used for the purpose of unlawfully selling, serving,  
14 storing, keeping, manufacturing, or giving away any controlled substance, precursor, or  
15 analog specified in this division . . ." (Health & Saf. Code, § 11570).

16 20. The NAL provides that every building or place used for the purpose of  
17 unlawfully selling, serving, storing, keeping, manufacturing, or giving away any controlled  
18 substance, precursor, or analog *inter alia*, "is a nuisance which **shall** be enjoined, abated,  
19 and prevented . . . whether it is a public or private nuisance." (Health & Saf. Code, § 11570  
20 [emphasis added]; *People ex rel Lungren v. Peron* (1997) 59 Cal.App.4th 1383, 1389; *Lew*  
21 *v. Superior Court* (1993) 20 Cal.App.4th 866, 870-871.)

22 21. Health and Safety Code section 11571 authorizes a city attorney to bring an  
23 action to abate, prevent and perpetually enjoin such nuisances. It provides in relevant part:  
24 "Whenever there is reason to believe that a nuisance as described in Section 11570 is  
25 kept, maintained, or exists in any county, the district attorney of the county, or the city  
26 attorney of any incorporated city or of any city and county, in the name of the people, may .  
27 . . maintain an action to abate and prevent the nuisance and perpetually to enjoin the  
28 person conducting or maintaining it, and the owner, lessee, or agent of the building or place

1 in or upon which the nuisance exists from directly or indirectly maintaining or permitting the  
2 nuisance."

3       22. Health and Safety Code section 11573(a) provides that: "If the existence of  
4 the nuisance is shown in the action to the satisfaction of the court or judge, either by  
5 verified complaint or affidavit, the court or judge **shall** allow a temporary restraining order or  
6 injunction to abate and prevent the continuance or recurrence of the nuisance." (Emphasis  
7 added.) In addition, Health and Safety Code section 11581 provides, as an additional  
8 remedy, for the removal and sale of all fixtures and movable property on the premises used  
9 in aiding or abetting the nuisance and for the closure of the building for up to one year.

10                   IV. **THE PUBLIC NUISANCE LAW**

11       23. Civil Code section 3479 defines a public nuisance as "[a]nything which is  
12 injurious to health, including, but not limited to, the illegal sale of controlled substances, or  
13 is indecent or offensive to the senses, or an obstruction to the free use of property, so as to  
14 interfere with the comfortable enjoyment of life or property...." (See *City of Bakersfield v.*  
15 *Miller* (1966) 64 Cal.2d 93, 99 ["The Legislature has defined in general terms the word  
16 'nuisance' in Civil Code section 3479. . . .".])

17       24. Civil Code section 3480 defines a public nuisance as "one which affects at the  
18 same time an entire community or neighborhood, or any considerable number of persons,  
19 although the extent of the annoyance or damage inflicted upon individuals may be  
20 unequal."

21       25. In particular, drug dealing, loitering, consumption of illegal drugs, and  
22 boisterous conduct which creates a hooligan-like "atmosphere" constitutes a public  
23 nuisance. (*People ex rel. Gallo v. Acuna* (1997) 14 Cal.4th 1090, 1120.)

24       26. Civil Code section 3491 provides that the "remedies against a public nuisance  
25 are indictment or information, a civil action or abatement." Abatement is "accomplished by  
26 a court of equity by means of an injunction proper and suitable to the facts of each case."  
27 (*Sullivan v. Royer* (1887) 72 Cal. 248, 249.)

28       27. Code of Civil Procedure section 731 authorizes a city attorney to bring an

1 action to enjoin or abate a public nuisance. It provides in relevant part “[a] civil action may  
2 be brought in the name of the people of the State of California to abate a public nuisance  
3 . . . by the city attorney of any town or city in which such nuisance exists.”

4       28.   Where "a building or other property is so used as to make it a nuisance under  
5 the statute, the nuisance may be abated . . . , notwithstanding that the owner had no  
6 knowledge that it was used for the unlawful purpose constituting a nuisance." (*People ex*  
7 *rel. Bradford v. Barbiere* (1917) 33 Cal.App. 770, 779; see also *Sturges v. Charles L.*  
8 *Harney, Inc.* (1958) 165 Cal.App.2d 306, 318 ["a nuisance and liability therefore may exist

9 without negligence"]; *People v. McCadden* (1920) 48 Cal.App. 790, 792 ["A judgment

10 supported on findings that such nuisance was conducted and maintained on the premises

11 in question, regardless of the knowledge of the owner thereof, is sufficient. Such

12 knowledge on the part of the owner . . . is unnecessary."]; *People v. Peterson* (1920) 45

13 Cal.App. 457, 460 ["[I]t was not necessary . . . for the trial court to find either, that the

14 [defendants] threatened, and unless restrained, would continue to maintain, aid, and abet,

15 the nuisance, or that they knew the building was used in violation of the act. . . . The

16 existence of the nuisance was the ultimate fact in this case, and having been found,

17 supports the judgment."].) This is because "the object of the act is not to punish; its

18 purpose is to effect a reformation of the property itself." (*People v. Bayside Land Co.*

19 (1920) 48 Cal.App. 257, 261.)

## **FIRST CAUSE OF ACTION FOR NARCOTICS ABATEMENT**

**[Health and Safety Code Section 11570, et seq. --**

**Against Defendant DORION ORLANDO MURRAY and DOES 1 through 25]**

29. Plaintiff incorporates paragraphs 1 through 28 above as if fully alleged herein.

30. Since at least 2015, the Property has been, and is *currently* being used for the purposes of unlawfully selling, serving, storing, keeping, manufacturing or giving away controlled substances in violation of Health and Safety Code section 11570, *et seq.* The general reputation of the Property in the community and amongst law enforcement is that it is a location where the sale of methamphetamine and cocaine base takes place on a

regular basis by Defendant MURRAY.

31. Defendant MURRAY and DOES 1 through 25, are responsible for conducting, maintaining, and/or directly or indirectly permitting the nuisance as alleged herein. Plaintiff has no plain, speedy and adequate remedy at law, and unless Defendant MURRAY, and DOES 1 through 25, are restrained and enjoined by order of this Court, they will continue to use, occupy and maintain, and/or to aid, abet or permit, directly or indirectly, the use, occupation and maintenance of the Property, together with the fixtures and appurtenances located therein, for the nuisance complained of herein, to the great and irreparable damage of the public and in violation of California law.

## **SECOND CAUSE OF ACTION FOR PUBLIC NUISANCE**

**[Civil Code Section 3479, et seq. --**

**Against Defendant DORION ORLANDO MURRAY and DOES 1 through 25]**

32. Plaintiff incorporates by reference Paragraphs 1 through 31 of this Complaint and makes them part of this Second Cause of Action as though fully set forth herein.

33. Since at least 2015 and continuing through the present, Defendant MURRAY and DOES 1 through 25 have owned, acted as an owner, controlled, operated, managed, and used, and/or directly or indirectly permitted to be occupied and used, the Property in such a manner as to constitute a public nuisance in accordance with Civil Code sections 3479 and 3480. The public nuisance, as described herein, is injurious to health, indecent or offensive to the senses, and/or an obstruction to the free use of property, so as to substantially and unreasonably interfere with the comfortable enjoyment of life or property by those persons living on the Property and in the surrounding community.

34. The public nuisance consists of, but is not limited to, narcotics activity on the Property and the regular, intimidating, and disorderly presence of residents and their visitors who repair dilapidated vehicles at the Property and on the street adjacent to the Property resulting in chemical spills, exhaust fumes, loud power tool noise, trash, debris, lack of parking in the community, and blocked driveways of other properties.

35. Defendant MURRAY and DOES 1 through 25, in owning, controlling, conducting, maintaining, and/or permitting the use of the Property, directly or indirectly, as a public nuisance and failing to take reasonable steps to prevent or abate the ongoing nuisance, and as a result of this failure and mismanagement of the Property, have caused and/or contributed to a serious threat to the general health, safety, and welfare of persons in the surrounding community.

36. Unless Defendant MURRAY and DOES 1 through 25, are restrained and enjoined by order of this Court, they will continue to use, occupy, and maintain, and to aid, abet, or permit, directly or indirectly, the use, occupation, and maintenance of the Property, together with the fixtures and appurtenances located therein, for the purpose complained of herein, to the great and irreparable damage of Plaintiff and in violation of California law.

## PRAYER

WHEREFORE, PLAINTIFF PRAYS THAT THIS COURT ORDER, ADJUDGE AND  
DECREE AS FOLLOWS:

## AS TO THE FIRST CAUSE OF ACTION

1. That Defendant DORION ORLANDO MURRAY, DOES 1 through 25, and the Property, be declared in violation of Health and Safety Code section 11570, et seq.

2. That the Property, together with the fixtures and moveable property therein and thereon, be found to constitute a public nuisance and be permanently abated as such in accordance with Section 11581 of the California Health and Safety Code.

3. That the Court grant a preliminary injunction, permanent injunction and order of abatement in accordance with Section 11570, *et. seq.*, of the California Health and Safety Code, enjoining and restraining each Defendant and their agents, officers, employees, heirs and anyone acting on their behalf, from unlawfully selling, serving, storing, keeping, manufacturing, or giving away controlled substances on the Property, and/or directly or indirectly maintaining or permitting such nuisance activity.

4. That the Court order physical and managerial improvements to the Property in accordance with California Health and Safety Code section 11573.5, and such orders as

1 are otherwise appropriate, to remedy the nuisance on the Property and enhance the  
2 abatement process, including but not limited to, a prohibition on Defendant DORION  
3 ORLANDO MURRAY'S presence at or within 1000 feet of the Property at any time, for any  
4 reason; evicting any residents involved in narcotics activity or violent crime; prohibiting  
5 known narcotics users and dealers from accessing the Property; and strict limitations on  
6 who else may be present on the Property at all times.

7       5. That as part of the Judgment, an Order of Abatement be issued, and that the  
8 Property be closed for a period of one year, not to be used for any purpose, and be under  
9 the control and custody of this Court for said period of time; or, in the alternative, if the  
10 Court deems such closure to be unduly harmful to the community, that Defendant DORION  
11 ORLANDO MURRAY, and DOES 1 through 25, pay an amount of damages equal to the  
12 fair market rental value of the Property for one year to the City or County in whose  
13 jurisdiction the nuisance is located in accordance with Health and Safety Code section  
14 11581 subdivision (c)(1).

15       6. That Defendant DORION ORLANDO MURRAY, and DOES 1 through 25,  
16 each be assessed a civil penalty in an amount not to exceed twenty-five thousand dollars  
17 (\$25,000.00).

18       7. That all fixtures and moveable property used in conducting, maintaining, aiding  
19 or abetting the nuisance at the Property be removed by the LAPD and sold in the manner  
20 provided for the sale of chattels under execution. Said fixtures and property shall be  
21 inventoried and a list prepared and filed with this Court.

22       8. That there shall be excepted from said sale, such property to which title is  
23 established in some third party not a defendant, nor agent, officer, employee or servant of  
24 any defendant in this proceeding.

25       9. That the proceeds from said sale be deposited with this Court for payment of  
26 the fees and costs of sale. Such costs may occur in closing said property and keeping it  
27 closed, removal of said property, and Plaintiff's costs in the Action, including attorneys'  
28 fees, and such other costs as the Court shall deem proper.

1           10. That if the proceeds of the sale do not fully discharge all such costs, fees and  
2 allowances, the Property shall also be sold under execution issued upon the order of the  
3 Court or judge and the proceeds of such sale shall be applied in a like manner. That any  
4 excess monies remaining after payment of approved costs shall be delivered to the owner  
5 of said property. Ownership shall be established to the satisfaction of this Court.

6           11. That Defendant DORION ORLANDO MURRAY, and DOES 1 through 25, and  
7 any agents, trustees, officers, employees and anyone acting on their behalf, and their heirs  
8 and assignees, be perpetually enjoined from transferring, conveying, or encumbering any  
9 portion of the Property, for consideration or otherwise, without first obtaining the Court's  
10 prior approval.

11           12. That Defendant DORION ORLANDO MURRAY, and DOES 1 through 25, and  
12 any agents, trustees, officers, employees and anyone acting on their behalf, and their heirs  
13 and assignees, be ordered to immediately notify any transferees, purchasers, commercial  
14 lessees, or other successors in interest to the subject Property of the existence and  
15 application of any temporary restraining order, preliminary injunction, or permanent  
16 injunction to all prospective transferees, purchasers, commercial lessees, or other  
17 successors in interest, *before* entering into any agreement to sell, lease or transfer the  
18 Property, for consideration or otherwise.

19           13. That Defendant DORION ORLANDO MURRAY, and DOES 1 through 25, and  
20 any agents, trustees, officers, employees and anyone acting on their behalf, and their heirs  
21 and assignees, be ordered to immediately give a complete, legible copy of any temporary  
22 restraining order and preliminary and permanent injunctions to all prospective transferees,  
23 purchasers, lessees, or other successors in interest to the Property.

24           14. That Defendant DORION ORLANDO MURRAY, and DOES 1 through 25, and  
25 any agents, trustees, officers, employees and anyone acting on their behalf, and their heirs  
26 and assignees, be ordered to immediately request and procure signatures from all  
27 prospective transferees, purchasers, lessees, or other successors in interest to the subject  
28 Property, which acknowledges his/her respective receipt of a complete, legible copy of any

1 temporary restraining order, preliminary and permanent injunction, at least 30 days prior to  
2 the close of escrow, and deliver a copy of such acknowledgment to the Los Angeles City  
3 Attorney's Office, c/o Deputy City Attorney Maria Aguillon or her designee.

4 15. That Plaintiff recover the costs of this Action, including law enforcement  
5 investigative costs and any fees, including attorneys' fees, authorized by law, not to exceed  
6 \$1,000,000.00, from Defendant DORION ORLANDO MURRAY, and DOES 1 through 25.

7 AS TO THE SECOND CAUSE OF ACTION

8 1. That the Property, together with the fixtures and moveable property therein  
9 and thereon, be declared a public nuisance and be permanently abated as such in  
10 accordance with Civil Code section 3491.

11 2. That Defendant DORION ORLANDO MURRAY, and DOES 1 through 25, and  
12 their agents, officers, employees and anyone acting on their behalf, and their heirs,  
13 successors and assignees, be preliminarily and perpetually enjoined from operating,  
14 conducting, using, occupying, or in any way permitting the use of the Property as a public  
15 nuisance. Such orders may include, but not be limited to: a) an order that Defendant  
16 DORION ORLANDO MURRAY, and DOES 1 through 25 permanently stay 1000 feet away  
17 from the Property; b) an order prohibiting Defendant DORION ORLANDO MURRAY, DOES  
18 1 through 25 and their guests at the Property from operating any unlicensed or unpermitted  
19 business at the Property; c) an order prohibiting Defendant DORION ORLANDO MURRAY,  
20 DOES 1 through 25 and their guests at the Property from repairing any vehicles at the  
21 Property or within 500 feet of the Property; d) an order allowing Defendant DORIAN  
22 ORLANDO MURRAY, DOES 1 through 25 and their guests at the Property to only park  
23 their vehicles within 100 feet of the Property, and any such other orders as are appropriate  
24 to remedy the nuisance on the Property and enhance the abatement process.

25 3. That Plaintiff be awarded such costs as may occur in abating said nuisance at  
26 the Property and such other costs as the Court may deem just and proper.

27 4. That Plaintiff be granted such other and further relief as the Court deems just  
28 and proper, including closure and/or demolition of the Property.

**AS TO ALL CAUSES OF ACTION**

1. That Plaintiff recover the amount of the filing fees and the amount of the fee for the service of process or notices which would have been paid but for Government Code section 6103.5, designating it as such. The fees may, at the Court's discretion, include the amount of the fees for certifying and preparing transcripts.

2. That Plaintiff be granted such other and further relief as the Court deems just and proper.

DATED: May 16, 2019

Respectfully submitted,

MICHAEL N. FEUER, City Attorney  
JONATHAN CRISTALL, Assistant City Attorney  
LIORA FORMAN-ECHOLS, Asst. Superv. Deputy  
City Attorney

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STATE OF CALIFORNIA